

# *Federation of Independent Seafood Harvesters*

PMB 168  
1567 Spinnaker Dr., Suite 203  
Ventura, CA 93001

**DIRECTORS:**

Tony West  
(310) 832-8143  
FAX (310) 514-2193

Pete Dupuy  
(818) 343-9927  
FAX (818) 881-5003

Donald Krebs  
(858) 279-2777

Jim Lone, Chair  
Pacific Fishery Management Council  
2130 SW Fifth Ave., Suite 224  
Portland, OR 97201

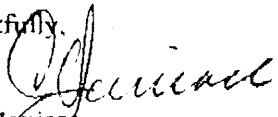
June 13, 2000

Dear Jim,

At this point in the development of the Pacific Fishery Management Council's (PFMC) fishery management plan (FMP) for highly migratory species (HMS), Federation of Independent Seafood Harvesters (FISH) requests that, in place of state regulation of HMS fisheries, the PFMC direct this FMP for HMS to regulate entirely the HMS fisheries that operate within the PFMC's jurisdiction. Reasons in support of this request are:

1. Choice of HMS species for designation as "management unit species" depends on choice of fisheries to be regulated under this FMP. For example, if the California driftnet fishery for thresher shark and swordfish is not directly regulated by this FMP, selection of thresher shark or swordfish as a "management unit species" complicates the implementation of appropriate management measures regarding these species under authority of this FMP (see below).
2. A state's HMS fishery regulations require legislative or regulatory enactment in order to respond to management measures recommended by international fishery management bodies, for consistency with Western Pacific Council regulations, or for protected resource management measures such as might be recommended by the Pacific Offshore Cetacean Take Reduction Team. In this regard, management by state processes complicates timely implementation of management needs and runs the risk of inconsistent regulatory enactments.
3. The complexity of existing regulatory inconsistencies between the various states would be difficult to reconcile without incorporation into a single federal FMP. Confusion among regional HMS fishermen as to what regulations apply to whom in what circumstances would almost certainly create widespread confusion unless the regulatory structure under this FMP is consistent. A single HMS FMP regulatory authority creates such consistency.

Respectfully,

  
Chuck Janisse

On behalf of the Directors for the membership of the Federation of Independent Seafood Harvesters,





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PFMC

Dr. Dale Squires  
NMFS SWFSC  
PO Box 271  
La Jolla, CA 92038-0271

Mr. Steve Crooke  
CDFG  
330 Golden Shore Dr., Ste. 50  
Long Beach, CA 90802-4247

2 June 2000

Dear Dale and Steve,

WWF believes it is vital for all species *caught* in the fisheries targeting highly migratory species (HMS) to be covered under the Pacific Fishery Management Council's (PFMC) HMS Fishery Management Plan (FMP or Plan). As the Plan is also intended to serve as a mechanism to implement any relevant management measures adopted by the Inter-American Tropical Tuna Commission (IATTC) and the new Convention for HMS fisheries in the central and western Pacific Ocean, it is important the Plan include any other species covered under those Conventions.

Building on the landings data already compiled, we would suggest the Plan Team develop a comprehensive table presenting the following information:

- All species *caught* in the HMS fisheries.
  - Under this category it may be useful to differentiate the species caught in the US PFMC area and those caught in other areas where the US fleet operates.
- Percentage of the total catch for each species.
- Percentage of the total landings for each species.
- A vulnerability index for each species based on catch rates, intrinsic rebound potential and/or other appropriate criteria.

**World Wildlife Fund**

1250 Twenty-Fourth St., NW Washington, DC 20037-1132 USA

Tel: (202)293-4800 Fax: (202)293-9211

[www.worldwildlife.org](http://www.worldwildlife.org)

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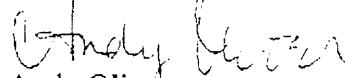
It would also be useful to understand, based on tag return information, which species caught in the HMS fisheries operating under PFMC jurisdiction are:

- Caught solely in the PFMC area.
- Shared with WESPAC and/or the NPFMC.
- Shared with Mexico and/or Canada.

This information would assist the process of identifying species priorities and lend clarity to the Council's ultimate task of identifying appropriate management and collaboration actions for the species/fisheries in question.

Thank you for your consideration.

Sincerely yours,



Andy Oliver  
Senior Program Officer  
Marine Conservation Program